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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

THOMAS ROGER WHITE, JR. and PATRICIA
CAULEY on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

SAMSUNG ELECTRONICS AMERICA, INC.
and SONY ELECTRONICS INC.,

Defendants.

Civil Action No. 17-1775 (MCA)(SCM)

Document electronically filed

**DECLARATION OF MICHAEL R.
MCDONALD, ESQ. IN SUPPORT OF
APPLICATION FOR ADMISSION
PRO HAC VICE OF
JORDAN S. JOACHIM, ESQ. AND
CELIN CARLO-GONZALEZ, ESQ.**

I, MICHAEL R. MCDONALD, of full age, declare, under penalty of perjury, as follows:

1. I am a Director of Gibbons P.C., and counsel of record for Defendant Samsung Electronics America, Inc. ("SEA") in this matter. I respectfully submit this declaration to the Court in support of SEA's application for an Order granting Jordan S. Joachim, Esq. and Celin Carlo-Gonzalez, Esq. admission *pro hac vice* in this matter pursuant to Local Civil Rule 101.1(c). I am personally familiar with the facts set forth in this Declaration.

2. I am a member in good standing of the bars of the State of New Jersey, the Commonwealth of Pennsylvania, the United States District Court for the District of New Jersey, and the United States Court of Appeals for the Third Circuit.

3. On or about September 13, 2023, counsel for Plaintiffs consented to the admission *pro hac vice* of Jordan S. Joachim, Esq. and Celin Carlo-Gonzalez, Esq. in this matter.

4. If the Court grants SEA's application for the admission *pro hac vice* of Jordan S. Joachim and Celin Carlo-Gonzalez, I or another member of Gibbons P.C. who is a member in good standing of the bars of the State of New Jersey and the United States District Court for the District of New Jersey will continue to serve as counsel of record in this matter, will review and sign all pleadings, briefs, and other papers filed with the Court, will be present for all appearances before the Court unless previously excused from appearing by the Court, will be responsible for the conduct of this action and for the conduct of Jordan S. Joachim, Esq. and Celin Carlo-Gonzalez, Esq., and will otherwise comply with all the terms and conditions of Local Civil Rule 101.1(c).

5. For the foregoing reasons and those set forth in the Declarations of Jordan S. Joachim, Esq. and Celin Carlo-Gonzalez, Esq., submitted herewith, it is respectfully requested that the Court execute and direct the entry the entry of the attached Order admitting Jordan S. Joachim, Esq. and Celin Carlo-Gonzalez, Esq. *pro hac vice* for the purpose of representing SEA in this litigation.

I declare under penalty of perjury that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Dated: September 14, 2023

By: s/ Michael R. McDonald
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